

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

YIHOU HAN,

Defendant.

Case No. 2:21-cr-20256-LVP-DRG-1

Judge: Honorable Linda V. Parker

MOTION FOR LEAVE TO FILE A DOCUMENT UNDER SEAL

The United States of America, by and through undersigned counsel, respectfully moves the Court to issue an Order directing that the Government's Sentencing Recommendation in the above-captioned case, be sealed pending further Order of Court. In support of this Motion, it is respectfully submitted that this Sentencing Recommendation contains sensitive information regarding the defendant's compliance with the terms of the plea agreement. The Government further requests that, due to the impracticability of redacting said document because the document is replete with sensitive information, the Government shall not be required to file a redacted version of the document.

Respectfully submitted,

GLENN S. LEON

Chief

United States Department of Justice

Criminal Division, Fraud Section

/s/ Amanda F. Lingwood

CORY E. JACOBS

Assistant Chief

AMANDA FRETTO LINGWOOD

Trial Attorney

Attorneys for Plaintiff

UNITED STATES OF AMERICA